



**Prifysgol Cymru**  
Y Drindod Dewi Sant  
**University of Wales**  
Trinity Saint David

# **Annual Modern Slavery and Human Trafficking Statement 2023/2024**

**Mae'r ddogfen hon ar gael yn Gymraeg ac yn Saesneg | This document is available in Welsh and English**

## **1. Introduction**

This statement is issued by the Chair of the UWTSD Council for UWTSD and the Chair of the Board of Coleg Sir Gâr pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the UWTSD Group's Slavery and Human Trafficking Statement for the financial year ending 31 July 2024. In addition, this statement sets out the UWTSD Group's undertakings in respect of [the Welsh Government Code of Practice on Ethical Employment in Supply Chains](#), to which the UWTSD Group has committed its support. The Group has identified a number of actions within the 12 commitments which is linked to its Procurement Policy.

The Modern Slavery Act 2015 recognises that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## **2. Group Structure**

### **University of Wales Trinity Saint David**

The University of Wales Trinity Saint David (hereinafter referred to as "UWTSD") is one of eight Higher Education (HE) institutions in Wales (not including the Open University in Wales) and has a total student population of over 28,000 (both Further and Higher Education).

The University was formed on 18 November 2010 through the merger of the University of Wales Lampeter and Trinity University College Carmarthen, under Lampeter's Royal Charter of 1828. On the 1 August 2013, Swansea Metropolitan University became part of UWTSD.

UWTSD is part of a Group structure which offers both Higher and Further Education and includes Coleg Sir Gâr (CSG) and Coleg Ceredigion. CSG became a subsidiary company of UWTSD in 2013 and Coleg Ceredigion became a subsidiary company of CSG in 2017. The Group offers a range of integrated pathways from year 10 upwards and has delivered transformational change for the region.

The University's annual turnover in the period covered by this report was £135.6

### **Coleg Sir Gâr**

Coleg Sir Gâr is a large, multi-campus, further education college. It has approximately 9,000 learners of which some 2,500 are full-time, over 6,000 are part-time. There are approximately 600 higher education learners. The College is based in South West Wales and has five main campuses at Llanelli (Graig), Carmarthen (Pibwrlwyd and Jobs Well), Ammanford and Llandeilo (Gelli Aur). Campuses vary in size and nature and most offer a variety of subjects.

The College has an annual turnover of £46.1m and employs approximately 577 staff. Of these, approximately 286 are directly involved in teaching and 291 in support and administrative functions.

### **Coleg Ceredigion**

Incorporated in 1993 following the amalgamation of four Further Education Institutions across Ceredigion, Coleg Ceredigion is the largest provider of FE provision in Ceredigion with a broad curriculum base.

Based on two main sites of 8,800m<sup>2</sup>, with approximately 170 staff, of whom around 70 are employed on a full-time basis The College provides education and training to the local community, and has an annual turnover of £6.5m. For the academic year 2023/24 there were 1,300 learners at the college.

### **3. Supply Chains**

The UWTSD Group purchases many of its goods and services from public sector purchasing consortia. The principal consortia are:

- National Procurement Service (NPS);
- Higher Education Purchasing Consortium for Wales (HEPCW);
- Crescent Purchasing Consortium (CPC);
- Crown Commercial Services (CCS).

The UWTSD Group and the consortia are developing processes to manage supply chain risks relating to slavery and human trafficking.

The joint contracting programme provides a comprehensive and mature collaborative portfolio, which includes some of the high risk categories.

Many of UWTSD Group's suppliers in these higher-risk categories have committed to the Base Code of the Ethical Trading Initiative (ETI) and the UK Universities Purchasing Consortia are working to persuade the remaining suppliers in these categories to join them. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

During the year to July 2024 the UWTSD Group acted responsibly to ensure compliance with the Modern Slavery Act 2015. The Group is committed to working towards ensuring there is no modern slavery or human trafficking in its supply chains or in any part of its organisational business. In light of the requirement to report on measures to ensure all parts of business and supply chain are slavery free, the Group will continue to review workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. The publication of this statement is also a requirement of the Welsh Government Ethical Employment in Supply Chains Code of Practice, which the UWTSD Group is committed to,

and became a signatory to alongside all Welsh universities in July 2017. The UWTSD Group is working towards achievement of the commitments of the Code of Practice (Appendix 1), which includes encouraging suppliers to adopt the Code.

#### **4. Policies and Procedures**

The UWTSD Group's Procurement Strategy includes the principles of the Modern Slavery Act 2015 and the Ethical Employment in Supply Chains. The Procurement Strategy demonstrates commitment to acting ethically and with integrity in all organisational business relationships to ensure slavery and human trafficking is not taking place within our supply chains.

Workplace and Study policies and procedures are reviewed regularly to ensure they reflect the 12 Code of practice commitments (Appendix 1).

The University has a Safeguarding Forum which oversees policies relating to the safeguarding of its students, a representative from Coleg Sir Gâr/Coleg Ceredigion attends this forum.

#### **5. Due Diligence**

As part of our commitment to identify and mitigate risk we will put in place systems to:

- Identify and assess potential risk areas in the our supply chain
- Mitigate the risk of slavery and human trafficking occurring in our supply chain
- Monitor potential risk areas in our supply chain
- Protect whistle-blowers

#### **6. Training**

The UWTSD Group's procurement staff have undertaken an e-learning module regarding modern slavery and ethical employment, and it is a mandatory training requirement, as key legislation, for all UWTSD staff.

#### **7. Ongoing Support**

The UWTSD Group is committed to better understanding its supply chains and working towards greater transparency and responsibility towards people engaged within them.

For contracts awarded and participated in, UWTSD will identify those supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with suppliers, collaborative purchasing groups and other relevant organisations, UWTSD will closely monitor those supply chains that have been identified as a potential risk and take appropriate action if necessary.

Emlyn Dole  
**Chair of Council (UWTSD)**

John Edge  
**Chair of the Board (CSG)**

## **Appendix 1 – Welsh Government Code of Practice Commitments Ethical Employment in Supply Chains**

Our organisation will:

1. Produce a written policy on ethical employment within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation and we will review it annually and monitor its effectiveness. As part of this we will:

1.1. Appoint an Anti-Slavery and Ethical Employment Champion.

2. Produce a written policy on whistleblowing to empower staff to raise suspicions of unlawful and unethical employment practices, and which places a responsibility on staff to report criminal activity taking place within our own organisation and our supply chains. Once produced we will communicate the policy throughout our organisation. We will review the policy annually and monitor its effectiveness.

We will also:

2.1. Provide a mechanism for people outside our organisation to raise suspicions of unlawful and unethical employment practices.

3. Ensure that those involved in buying/procurement and the recruitment and deployment of workers, receive training on modern slavery and ethical employment practices, and keep a record of those that have been trained.

4. Ensure that employment practices are considered as part of the procurement process. We will:

4.1. Include a copy of our Policy on ethical employment (Commitment 1) in all procurement documentation.

4.2. Include appropriate questions on ethical employment in tenders and assess the responses provided.

4.3. Incorporate, where appropriate, elements of the Code as conditions of contract.

4.4. Ask bidders to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.

5. Ensure that the way in which we work with our suppliers does not contribute to the

use of illegal or unethical employment practices within the supply chain. We will:

5.1. Ensure that undue cost and time pressures are not applied to any of our suppliers if this is likely to result in unethical treatment of workers.

5.2. Ensure that our suppliers are paid on time – within 30 days of receipt of a valid invoice.

6. Expect our suppliers to sign up to this Code of Practice to help ensure that ethical employment practices are carried out throughout the supply chain.

7. Assess our expenditure to identify and address issues of modern slavery, human rights abuses and unethical employment practice. We will:

7.1. Carry out regular reviews of expenditure and undertake a risk assessment on the findings, to identify products and/or services where there is a risk of modern slavery and/or illegal or unethical employment practices within the UK and overseas.

7.2. Investigate any supplier identified as high risk, by direct engagement with workers wherever possible.

7.3. Work with our suppliers to rectify any issues of illegal or unethical employment practice.

7.4. Monitor the employment practices of our high risk suppliers, making this a standard agenda item for all contract management meetings/reviews.

8. Ensure that false self-employment is not undertaken and that umbrella schemes and zero hours contracts are not used unfairly or as a means to:

8.1. Avoid, or facilitate avoidance of, the payment of tax and National Insurance contributions and the relevant minimum wages.

8.2. Unduly disadvantage workers in terms of pay and employment rights, job security and career opportunities.

8.3. Avoid Health and Safety responsibilities.

9. Ensure that workers are free to join a Trade Union or collective agreement and to undertake any related activity and raise worker concerns without risk of

discrimination. We will:

- 9.1. Not make use of blacklists/prohibited lists.
  - 9.2. Ensure that our suppliers do not make use of blacklists/prohibited lists.
  - 9.3. Not contract with any supplier that has made use of a blacklist/prohibited list and failed to take steps to put matters right.
  - 9.4. Expect our suppliers to ensure that Trade Union representatives can access members and contracted workers.
10. Consider paying all staff the Living Wage Foundation's Living Wage as a minimum and encourage our suppliers to do the same.

We will:

- 10.1. Consider paying at least the Living Wage Foundation's Living Wage to all our staff in the UK.
  - 10.2. Consider becoming an accredited Living Wage Employer.
  - 10.3. Encourage our suppliers based overseas to pay a fair wage to all staff, and to ensure that staff working in the UK are paid at least the minimum wage.
11. Produce an annual written statement outlining the steps taken during the financial year, and plans for future actions, to ensure that slavery and human trafficking are not taking place in any part of our organisation and its supply chains.

We will:

- 11.1. Ensure that the statement is signed off at senior management/board level.
- 11.2. Publish the statement on our website. If this is not possible, we will provide a copy to anyone within 30 days of a request being made.

All organisations signing up to this Code are expected to produce and publish this annual written statement – for commercial organisations with a turnover of £36m or more, this also fulfils the requirements of Section 54 of the Modern Slavery Act 2015.

We encourage all organisations to publish their statements on the Transparency in Supply Chains (TISC) register [www.tiscreport.org](http://www.tiscreport.org) free of charge for all public and small organisations. In exchange, they can make use of the Wales Antislavery Logo.

*For Public sector to whom the Code of Practice on Workforce Matters (2014) applies:*

12. Ensure all those undertaking work on an outsourced contract are treated fairly and equally. We will:

12.1. Ensure that public sector staff who are transferred as part of a public service which is outsourced to a third party retain their terms and conditions of employment.

12.2. Ensure that other staff working on an outsourced public service are employed on terms and conditions that are comparable to the transferred public sector staff.